

BERTOLDO CARTER SMITH & CULLEN
LAWRENCE J. SMITH, ESQ. (#6505)
JAMES R. SWEETIN, ESQ. (#5144)
7408 West Sahara Avenue
Las Vegas, Nevada 89117
Telephone: (702) 228-2600
Facsimile: (702) 228-2333
lawre3@nvlegaljustice.com
jsweetin@nvlegaljustice.com

6 **ROBERT L. LANGFORD & ASSOCIATES**
7 ROBERT L. LANGFORD, ESQ. (#3988)
8 1925 Village Center Circle, Suite 150,
9 Las Vegas, NV 89134
Telephone: (702) 379-0440
Facsimile: (702) 991-4223
robert@robertlangford.com

LAGOMARSINO LAW
ANDRE M. LAGOMARSINO, ESQ. (#6711)
TAYLOR N. JORGENSEN, ESQ. (#16259)
3005 W. Horizon Ridge Pkwy., #241
Henderson, Nevada 89052
Telephone: (702) 383-2864
Facsimile: (702) 383-0065
AML@lagomarsinolaw.com
Taylor@lagomarsinolaw.com
Attorneys for Plaintiffs Rosa Lainez, Lemus and

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ROSA LAINEZ LEMUS, individually and as natural parent and guardian of minor G.R.L.; G.R.L., a minor.

Plaintiffs.

V.

CLARK COUNTY SCHOOL DISTRICT, a political subdivision of the State of Nevada; JESUS F. JARA, in his individual and official capacity; RONNIE GUERZON, in his individual and official capacity; RAYMOND ORTIZ, in his individual and official capacity BROOKE RAWLINS, in her individual and official capacity; DOES I through 10, and ROE CORPORATIONS 1 through 10, inclusive.

Defendants.

CASE NO.: 2:24-cv-00700-JAD-MDC

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES**

(First Request)

1 IT IS HEREBY STIPULATED AND AGREED between the parties, in accordance with
2 LR 26-3, that the discovery deadlines in this matter be continued for a period of sixty (60) days
3 from the Court's prior Order (ECF No. 15). This Stipulation is supported by good cause, is the
4 Parties' first request, and is not for the purpose of delay.

5 **I. DISCOVERY COMPLETED TO DATE**

6 The parties have completed the following discovery to date:

- 7
- 8
- 9
- 10
- Exchanged their initial Rule 26 Disclosures.
 - Plaintiffs served an initial set of discovery (interrogatories and requests for production of documents) to Defendant CCSD on May 9, 2024, and CCSD served its responses thereto on July 1, 2024.

11 **II. DISCOVERY YET TO BE COMPLETED**

12 The Parties have yet to complete the following discovery:

- 13
- 14
- 15
- 16
- 17
- 18
- 19
- depositions of the named parties, including 30(b)(6) depositions;
 - depositions of witnesses identified by the parties;
 - expert witness disclosures;
 - rebuttal expert witness disclosures;
 - expert witness depositions;
 - additional written discovery which may include written discovery between the parties; and
 - subpoenas to third parties.

20 The Parties reserve the right to conduct additional discovery that is permitted by the Federal
21 Rules of Civil Procedure.

22 **III. REASONS WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED**

23 While the parties have been diligent in conducting discovery in this matter, the following
24 issues have been unavoidable. Defendants filed their Motion to Dismiss Plaintiffs' Amended
25 Complaint, and the Motion is still pending before this Court. (ECF No. 8). The Motion to
26 Dismiss was fully briefed as of May 30, 2024. The Parties have also worked together to dismiss
27

1 individual defendants JARA, GUERZON, ORTIZ, and RAWLINS, making CCSD the only
 2 remaining Defendant.

3 Plaintiffs' counsel's office is currently shorthanded as one associate is on paternity leave
 4 and the remaining three (3) attorneys in the office, including Plaintiffs' main attorney, are
 5 preparing for a two-week trial in the Eighth Judicial District Court. Plaintiffs' counsel's office's
 6 limited availability warrants an extension. Furthermore, the parties have been cooperating in
 7 this action and this extension is necessary and not for purposes of delay.

8 **IV. PROPOSED EXTENDED DEADLINES**

9 The parties respectfully request this Court enter an order granting this extension of
 10 discovery deadlines, as follows:

	<u>Current</u>	<u>Proposed</u>
Deadline for initial expert disclosures	08/09/24	Tuesday, October 8, 2024
Deadline for rebuttal expert disclosures	09/09/24	Friday, November 8, 2024
Close of Discovery	10/08/24	Monday, December 9, 2024
Deadline to file dispositive motions	11/07/24	Monday, January 6, 2025
Pre-Trial Order	12/09/24	Friday, February 7, 2025

17 **IT IS SO STIPULATED AND AGREED.**

18 DATED this 9th day of July, 2024.

19 **LAGOMARSINO LAW**

21 /s/ Taylor N. Jorgensen
 22 ANDRE M. LAGOMARSINO, ESQ. (#6711)
 TAYLOR N. JORGENSEN, ESQ. (#16259)
 3005 W. Horizon Ridge Pkwy., #241
 Henderson, Nevada 89052
 Telephone: (702) 383-2864
 Attorneys for Plaintiffs Rosa Lainez Lemus
 and G.R.L.

18 DATED this 9th day of July, 2024.

19 **CLARK COUNTY SCHOOL DISTRICT
 OFFICE OF THE GENERAL COUNSEL**

21 /s/ Melissa Alessi
 22 MELISSA ALESSI, ESQ. (#9493)
 5100 West Sahara Avenue
 Las Vegas, Nevada 89146
 Telephone: (702) 799-5373
 Attorney for Defendants Clark County
 School District, Jesus F. Jara,
 Ronnie Guerzon, Raymond Ortiz,
 and Brooke Rawlins

1 DATED this 9th day of July, 2024.

2 **BERTOLDO CARTER SMITH & CULLEN**

3 /s/ James R. Sweetin
4 LAWRENCE J. SMITH, ESQ. (#6505)
JAMES R. SWEETIN, ESQ. (#5144)
7408 West Sahara Avenue
5 Las Vegas, Nevada 89117
Telephone: (702) 228-2600
6 Attorneys for Plaintiffs Rosa Lainez Lemus
and G.R.L

7 DATED this 9th day of July, 2024.

8 **ROBERT L. LANGFORD & ASSOCIATES**

9 /s/ Robert L. Langford
10 ROBERT L. LANGFORD, ESQ. (#3988)
1925 Village Center Circle, Suite 150,
11 Las Vegas, NV 89134
Telephone: (702) 379-0440
12 Attorneys for Plaintiffs Rosa Lainez Lemus
and G.R.L

13 **IT IS SO ORDERED.**

14 
15 Hon. Maximilian D. Couvillier III
16 UNITED STATES MAGISTRATE JUDGE

17 DATED: 7/10/24